


U.S. Patent No. US 11,468,984 v. Citizen

1. Claim Chart

Claim	Analysis
<p>[12.P] A method for calculating a current load level of a user of a mobile end unit, comprising:</p>	<p>Citizen (“Company”) performs and/or induces others to perform a method for calculating a current load level of a user of a mobile end unit.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, Company provides smartwatches such as CZ Smart Sport Touchscreen ("mobile end unit") (used herein as an exemplary product), and CZ Smart Casual Touchscreen that provide a power gauge monitoring feature. These watches estimate a user's cognitive and physical energy levels throughout the day. The power gauge includes components such as Power Score (“current load level”), Power Forecast, Power Graph, Power Fixes and Biofeedback Inputs, which are derived from various inputs, such as, alert scores, chronotype, sleep patterns, activity, and heart rate parameters.</p>


CZ SMART
Sport Touchscreen

Shop Now




CZ SMART
Casual Touchscreen

Shop Now



CZ SMART
Hybrid

Shop Now



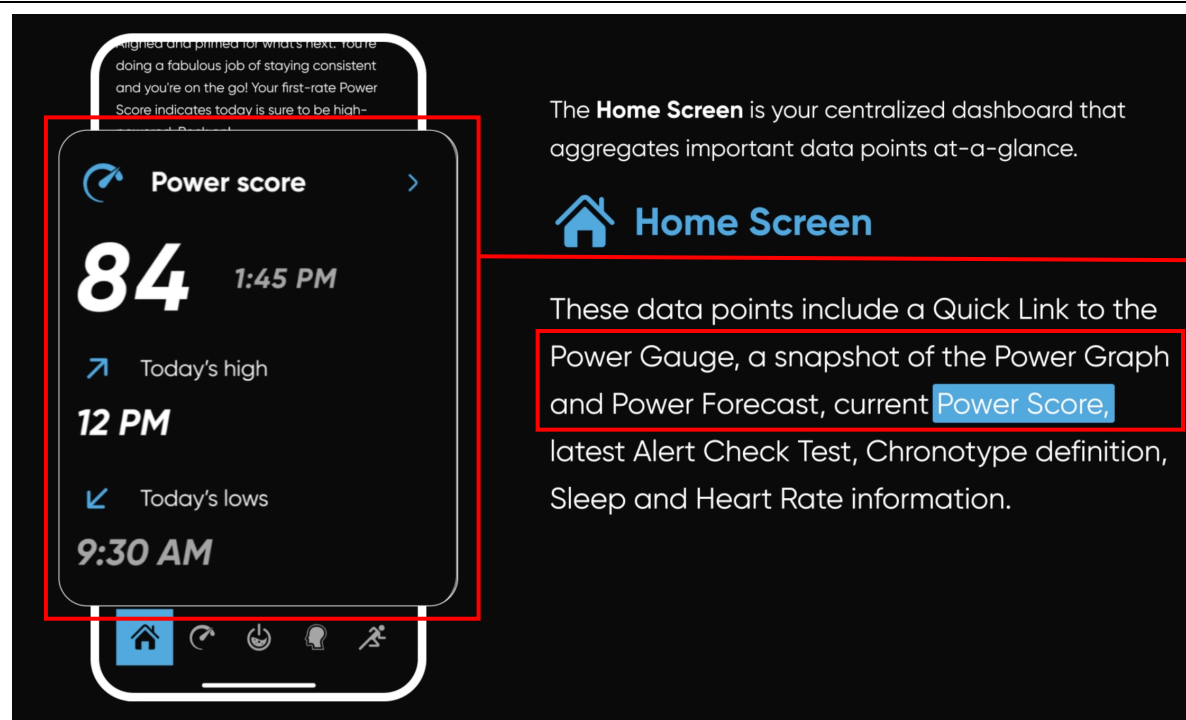
Citizen CZ Smart with IBM Watson® learns your YouQ to anticipate what's next — and make you smarter, too.

Gain deeper insight about your body's natural rhythms and develop better habits with CZ Smart YouQ, Citizen's proprietary wellness application that leverages AI models built with IBM Watson® Studio and research pioneered by NASA Ames Research Center to deliver a 24-hour forecast, hourly Power Score, and so much more.

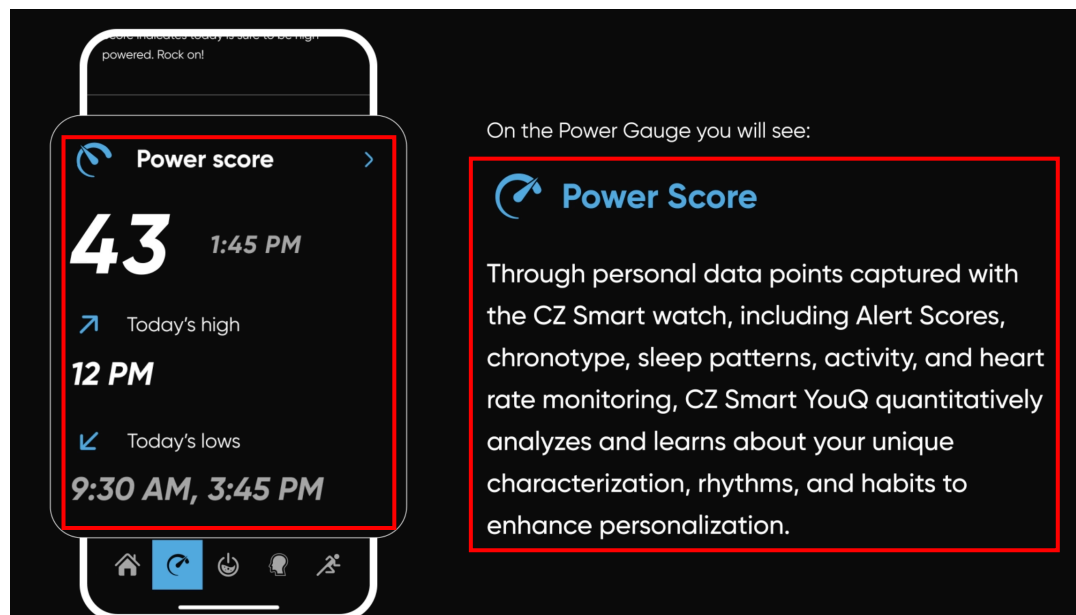
Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html> (annotated)

Mobile
end unit

3



Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html> (annotated)



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Citizen CZ Smart with IBM Watson® learns your YouQ to anticipate what's next — and make you smarter, too.

Gain deeper insight and develop better habits with the advanced-technological features of the CZ Smart with YouQ — the app that combines AI models built with IBM Watson® Studio and research pioneered by NASA Ames Research Center to deliver a **24-hour forecast** and hourly **Power Score** — a highly personalized indicator of your cognitive and physical energy.

These insights are paired with **Power Fixes** — suggested actions to help you extend peaks and curb drops in alertness and promote the building of better habits, so you can optimize for what's ahead each day.

Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html>

The Power Gauge is the control center for the CZ Smart YouQ app. Leveraging AI-driven analytics built with IBM Watson® Studio along with biofeedback captured from your CZ Smart Smartwatch, the Power Gauge dynamically displays personalized hourly forecasts, actionable recommendations, and a daily Power Graph that visualizes when throughout the day you'll experience peaks and drops in energy and alertness levels, as well as how aligned you are with your chronotype baseline. No two days are exactly alike, and neither is your Power Gauge.

There are three ways to access the Power Gauge. From the Dashboard simply tap anywhere in your Power Graph to go to your Power Gauge. You can also tap "Power Gauge" on the top navigation or the Power Gauge icon on the main navigation bar.

The Power Gauge includes your Power Score, Power Forecast, Power Graph, Power Fixes and Biofeedback Inputs.

Source: <https://support.citizenwatch.com/hc/en-us/articles/11457202153623-Making-the-Most-of-the-Power-Gauge>

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

<p>[12.1] starting a further application installed on the mobile end unit so that this is carried out on the mobile end unit,</p>	<p>Company performs and/or induces others to perform the step of starting a further application installed on the mobile end unit so that this is carried out on the mobile end unit.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the CZ Smart Sports Touchscreen watch includes the Power gauge that monitors and tracks the user's cognitive and physical energy levels throughout the day and displays components such as Power Score, Power Forecast, Power Graph, Power Fixes and Biofeedback Inputs. Therefore, it would be apparent to a person having ordinary skills in the art that the CZ Smart Sports Touchscreen watch comprises a power monitoring application (“further application”) designed to monitor and display the user's power score .</p>
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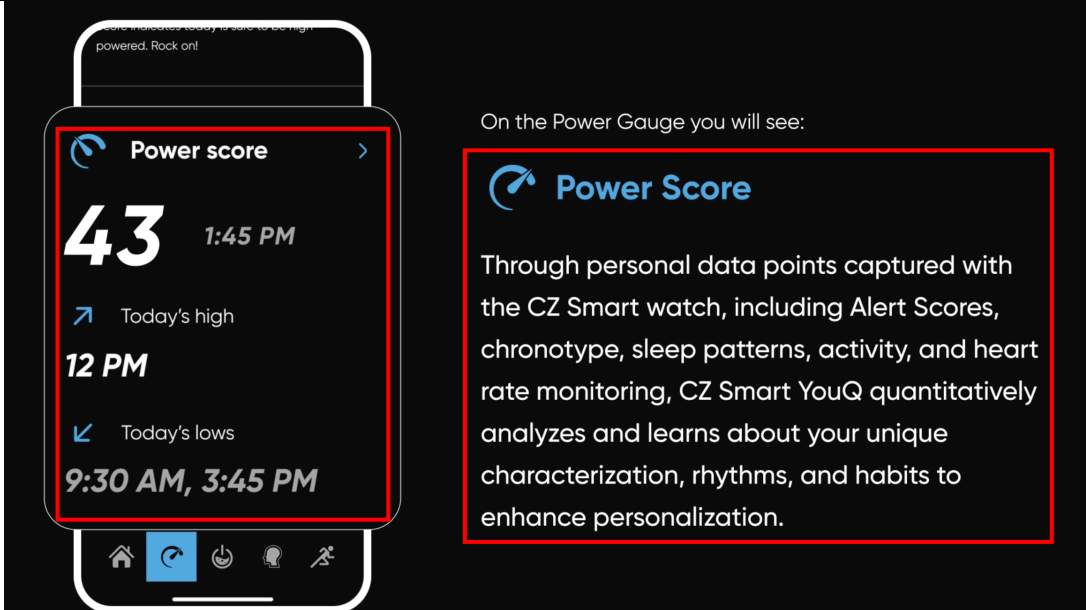
Source: <https://support.citizenwatch.com/hc/en-us/articles/11457202153623-Making-the-Most-of-the-Power-Gauge>



Measurement of activity, heart rate and blood oxygen levels (SPO2)

The watch records data of measurement above and shows them on the dedicated app and send them to health care apps.

Source: <https://citizenwatch.widen.net/content/hjwdqwk4e/pdf/hjwdqwk4e.pdf?&u=41zuoe>



powered. Rock on!

Power score

43 1:45 PM

Today's high
12 PM

Today's lows
9:30 AM, 3:45 PM

On the Power Gauge you will see:

Power Score

Through personal data points captured with the CZ Smart watch, including Alert Scores, chronotype, sleep patterns, activity, and heart rate monitoring, CZ Smart YouQ quantitatively analyzes and learns about your unique characterization, rhythms, and habits to enhance personalization.

Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html>

The Power Score is a perceptual measure of your Personal Power Level (PPL), which lets you know what your cognitive and physical capacity is at any given moment of the day. You can check your Power Score throughout the day to track your PPL and anticipate when you'll be in peak form or need to take a step back and rest. Your alignment with your body's natural rhythms also impacts your PPL, so it's important to maintain consistent sleep and activity schedules and practice healthy habits. A strong Power Score may not translate to peak performance if you're significantly out of sync with your baseline. So, be sure to wear your CZ Smart watch to bed to capture your sleep data accurately and consistently.

Power Score Ranges	Capacity
81-100	High
51-80	Good
0-50	Low

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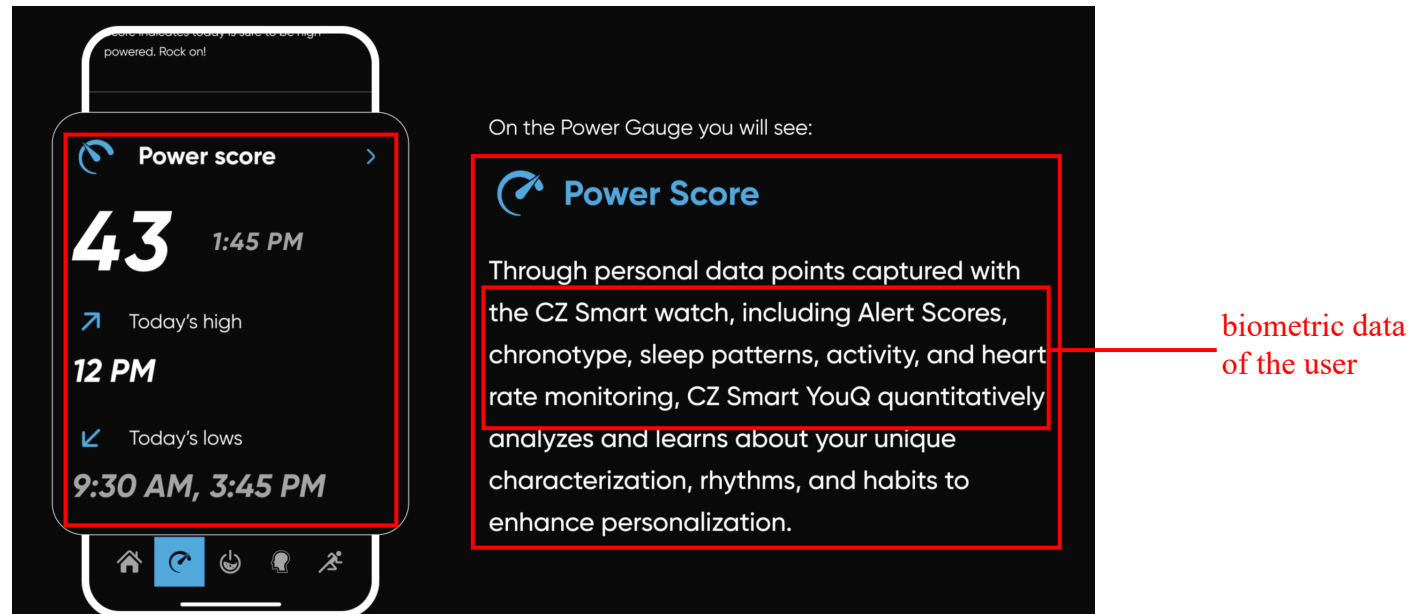
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[12.2] calculating biometric data of the user by means of the further application, wherein the biometric data is recorded at least from user data that is recorded from using a plurality of applications present and available on the mobile end unit by the user, and calculated from at least one signal data produced by at least one sensor integrated into the

Company performs and/or induces others to perform the step of calculating biometric data of the user by means of the further application, wherein the biometric data is recorded at least from user data that is recorded from using a plurality of applications present and available on the mobile end unit by the user, and calculated from at least one signal data produced by at least one sensor integrated into the mobile end unit.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the CZ Smart Sports Touchscreen watch calculates different health-related metrics such as, alert scores, chronotype, sleep patterns, heart rate, SP02, cardiac rhythm (“biometric data of the user”) based on the data received from the embedded sensors such as, gyroscope, altimeter, barometer, accelerometer, and ambient light sensor (“at least one signal data produced by at least one sensor integrated into the mobile end unit”) and the physical activities performed by the user (“user data that is recorded from using a plurality of applications present and available on the mobile end unit by the user”). Further, the measured health metrics such as, alert scores, chronotype, sleep patterns, heart rate, SP02, and cardiac rhythm, are monitored by the power monitoring application (“by means of the further application”) to calculate the power score of the user.



mobile end
unit,

Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html> (annotated)

Acceleration sensor and optical sensor

This watch is equipped with a built-in acceleration sensor and an optical sensor.

They always execute measurement while you wear the watch.

- The acceleration sensor measures your action such as steps and the optical sensor measures your heart rate and blood oxygen levels (SPO2).
- If you hold something in the hand of watch-wearing side, the sensors may measure wrongly.

You can check measured data in real-time on the watch. On the [WELLNESS] screen of the dedicated app, the data are shown in graphs as daily/weekly/monthly records.

Source: <https://citizenwatch.widen.net/content/hjwdqwk4e/pdf/hjwdqwk4e.pdf?&u=41zuoe>

Sensors

Gyroscope, Altimeter, Barometer, Accelerometer,
HeartRate, SP02, Ambient Light Sensor

at least one sensor
integrated into the
mobile end unit

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Measurement of activity, heart rate and blood oxygen levels (SPO2)

The watch records data of measurement above and shows them on the dedicated app and send them to health care apps.

at least from user data
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and available on the
mobile end unit by the
user

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	<p>In addition, on the screen of dedicated app, you can check status of activities categorized by types, activity time, calorie consumption derived from your height and weight, sleep time, etc.</p> <ul style="list-style-type: none"> • Activity data recorded in the watch is transferred to the dedicated app when the watch and the smartphone are synchronized and it is stored in the app. • Up to about 40-day data of activity is saved on the watch. • Data gathered with this product can be sent to other apps and browsed. • This product interprets actual movement of the watch detected through its acceleration sensor with its special way to figure out your activities such as your steps or sleep. <p>It is a kind of estimation and its results may differ from actual activities.</p> <ul style="list-style-type: none"> • Heart rate and blood oxygen levels got through the optical sensor on this watch are mere estimation calculated and derived from measurement, not for medical or remedial use. • You cannot edit data. You cannot also display activity data collected through other devices on the dedicated app of this watch. <p>Source: https://citizenwatch.widen.net/content/hjwdqwk4e/pdf/hjwdqwk4e.pdf?&u=41zuoe</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[12.3] wherein the biometric data from the at least one signal data is produced by said at least one sensor, and user data of said plurality of available</p>	<p>Company performs and/or induces others to perform the step wherein the biometric data from the at least one signal data is produced by said at least one sensor, and user data of said plurality of available applications, is divided into a plurality of categories.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the measured health-related metrics ("the biometric data") are categorized in multiple forms such as, heart rate, blood oxygen saturation, heart rate variability, and sleep data ("a plurality of categories").</p>

applications,
is divided
into a
plurality of
categories,



a plurality of
categories

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The Power Score is a perceptual measure of your Personal Power Level (PPL), which lets you know what your cognitive and physical capacity is at any given moment of the day. You can check your Power Score throughout the day to track your PPL and anticipate when you'll be in peak form or need to take a step back and rest. Your alignment with your body's natural rhythms also impacts your PPL, so it's important to maintain consistent sleep and activity schedules and practice healthy habits. A strong Power Score may not translate to peak performance if you're significantly out of sync with your baseline. So, be sure to wear your CZ Smart watch to bed to capture your sleep data accurately and consistently.

Power Score Ranges

81-100

51-80

0-50

Capacity

High

Good

Low

Source: <https://support.citizenwatch.com/hc/en-us/articles/11457202153623-Making-the-Most-of-the-Power-Gauge>

Measurement of activity, heart rate and blood oxygen levels (SPO2)

The watch records data of measurement above and shows them on the dedicated app and send them to health care apps.

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Acceleration sensor and optical sensor

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[12.4]
evaluating the biometric data with an evaluation unit provided in the mobile end unit or in

Company performs and/or induces others to perform the step of evaluating the biometric data with an evaluation unit provided in the mobile end unit or in a central server for determining the current load level.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the CZ Smart Sports Touchscreen watch comprises the Qualcomm Snapdragon Wear 4100+ processor, Power gauge, and multiple apps such as, the Heart Rate app, and Blood Oxygen app that track and calculate multiple health parameters for the user such as, heart rate, sleep data, and the power score ("the current load level"). Therefore, it

<p>a central server for determining the current load level,</p>	<p>would be apparent to a person having ordinary skills in the art that an evaluation unit is embedded inside the watch to calculate multiple health parameters.</p> <div data-bbox="457 321 1281 441" style="border: 1px solid red; padding: 5px; text-align: center;"> <p>Processor</p> <p>Qualcomm® Snapdragon™ Wear4100+</p> </div> <p>Source: https://www.citizenwatch.com/us/en/technology-smartwatches.html</p> <div data-bbox="415 527 1417 800" style="border: 1px solid red; padding: 5px;"> <p>The Power Gauge is the control center for the CZ Smart YouQ app. Leveraging AI-driven analytics built with IBM Watson® Studio along with biofeedback captured from your CZ Smart Smartwatch, the Power Gauge dynamically displays personalized hourly forecasts, actionable recommendations, and a daily Power Graph that visualizes when throughout the day you'll experience peaks and drops in energy and alertness levels, as well as how aligned you are with your chronotype baseline. No two days are exactly alike, and neither is your Power Gauge.</p> </div> <p>There are three ways to access the Power Gauge. From the Dashboard simply tap anywhere in your Power Graph to go to your Power Gauge. You can also tap "Power Gauge" on the top navigation or the Power Gauge icon on the main navigation bar.</p> <div data-bbox="415 1063 1375 1136" style="border: 1px solid red; padding: 5px;"> <p>The Power Gauge includes your Power Score, Power Forecast, Power Graph, Power Fixes and Biofeedback Inputs.</p> </div> <p>Source: https://support.citizenwatch.com/hc/en-us/articles/11457202153623-Making-the-Most-of-the-Power-Gauge</p>
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Measurement of activity, heart rate and blood oxygen levels (SPO2)

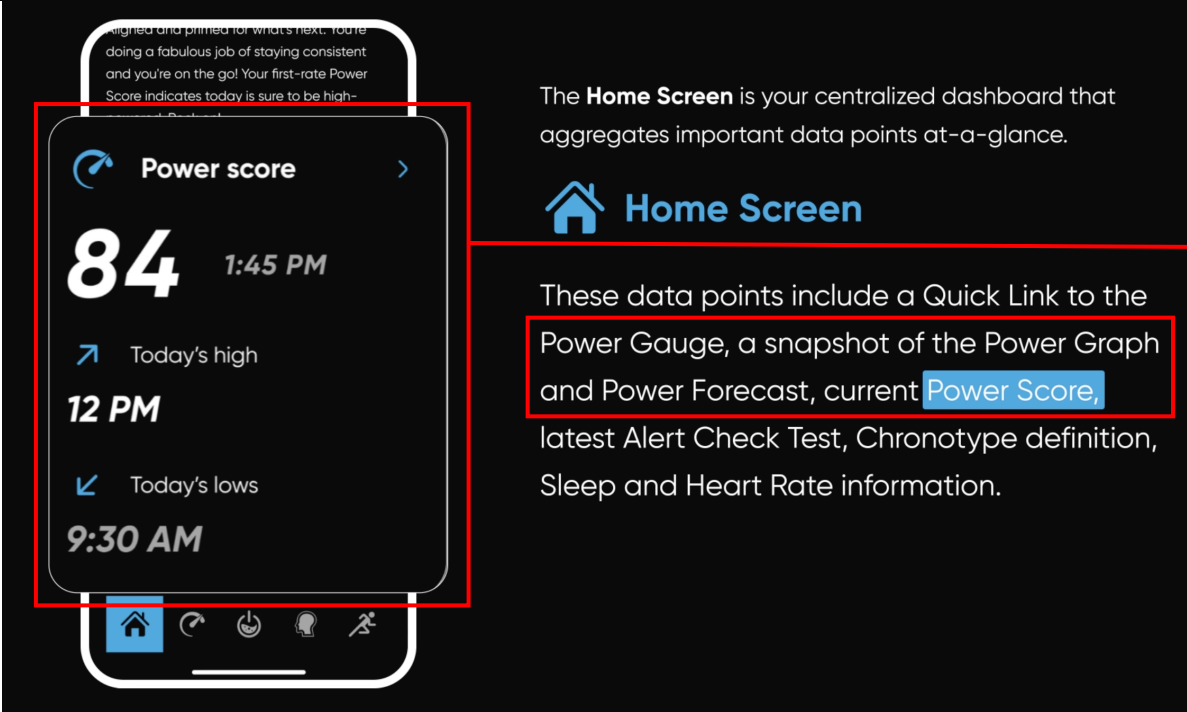
The watch records data of measurement above and shows them on the dedicated app and send them to health care apps.

Source: <https://citizenwatch.widen.net/content/hjwdqwk4e/pdf/hjwdqwk4e.pdf?&u=41zuoe>

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Power Score Ranges	Capacity
81-100	High
51-80	Good
0-50	Low

Source: <https://support.citizenwatch.com/hc/en-us/articles/11457202153623-Making-the-Most-of-the-Power-Gauge>

	 <p>The Home Screen is your centralized dashboard that aggregates important data points at-a-glance.</p> <p>Home Screen</p> <p>These data points include a Quick Link to the Power Gauge, a snapshot of the Power Graph and Power Forecast, current Power Score, latest Alert Check Test, Chronotype definition, Sleep and Heart Rate information.</p> <p>Current load level</p> <p>Source: https://www.citizenwatch.com/us/en/technology-smartwatches.html (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[12.5] wherein: category-specific load levels are ascertained by means of an arithmetic mean or a</p>	<p>Company performs and/or induces others to perform the step wherein category-specific load levels are ascertained by means of an arithmetic mean or a weighted mean of features relating to the biometric data pertaining to each category in the plurality of categories.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the CZ Smart Sports Touchscreen watch monitors and evaluates the biometric data of the user such as heart rate variability as well as daily activity, sleep data, heart rate, and blood oxygen saturation level ("category-specific load levels") using inbuilt sensors throughout the day. These scores are further utilized to determine the user's power score.</p>

weighted mean of features relating to the biometric data pertaining to each category in the plurality of categories,

Therefore, upon information and belief, the health scores for the user are evaluated by means of an arithmetic mean or a weighted mean of features relating to the biometric data pertaining to each category in the plurality of categories.

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Tracking



Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html>

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Power Score Ranges	Capacity								
81-100	High								
51-80	Good								
0-50	Low								
[12.6] the evaluation unit determines the current load level with the aid of a network of artificial neural networks,	<p>Company performs and induces others to perform the step wherein the evaluation unit determines the current load level with the aid of a network of artificial neural networks, the network of artificial neural networks comprises a plurality of artificial neural networks that interact with each other, the plurality of artificial neural networks calculates in parallel with a plurality of processors.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the CZ Smart Sports Touchscreen watch utilizes AI neural network models to provide a 24-hour forecast and an hourly power score ("the current load level"). Further, the Qualcomm Snapdragon Wear 4100+ processor embedded in the watch comprises a Quad-core ARM Cortex A53 processor, Cortex M0 co-processor, and Adreno 504 GPU ("a plurality of processors") that are used for parallel processing. Therefore, upon information and belief, the</p>								

the network of artificial neural networks comprises a plurality of artificial neural networks that interact with each other,

the plurality of artificial neural networks calculates in parallel with a plurality of processors,

network of artificial neural networks comprises a plurality of artificial neural networks that interact with each other such that the plurality of artificial neural networks calculates in parallel with a plurality of processors.



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Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html>

Processor

Qualcomm® Snapdragon™ Wear4100+

Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html>

Main Processor

- 12nm Quad-core Arm Cortex A53 up to 2.0 GHz optimized for wearables

Co-Processor

- Designed to support always-on experiences: enhanced ambient mode, sports mode, and traditional watch mode.
- Works alone or in conjunction with the main processor
- Small footprint: ~21mm²
- Cortex M0 processor
- Integrates custom designed SRAM, dedicated PMU, a deep learning engine for custom workloads, and range of IOs
- Runs highly efficient event-driven RTOS

GPU

- Adreno 504 GPU (up to 320MhZ): Open GL ES3.1 optimized power for wearables

DSP

- Dual Qualcomm® Hexagon™ QDSP6 v56
- Dedicated MDSP for modem and GPS
- Dedicated ADSP for Open Sensor Execution Environment (SEE) and audio

a plurality of
processors

	<p>Source: https://www.qualcomm.com/content/dam/qcomm-martech/dm-assets/documents/snapdragon-wear-4100-product-brief_87-pu782-1-c.pdf (annotated)</p> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p>
<p>[12.7] the plurality of processors is arranged on the mobile end unit or on the central server,</p>	<p>Company performs and induces others to perform the step wherein the plurality of processors is arranged on the mobile end unit or on the central server.</p> <p>This element is infringed literally, or in the alternative, under the doctrine of equivalents.</p> <p>For example, the Qualcomm Snapdragon Wear 4100+ processor embedded in the watch comprises a Quad-core ARM Cortex A53 processor, Cortex M0 co-processor, and Adreno 504 GPU ("a plurality of processors is arranged on the mobile end unit") that are used for parallel processing.</p> <div style="border: 2px solid red; padding: 10px; text-align: center;"> <p>Processor</p> <p>Qualcomm® Snapdragon™ Wear4100+</p> </div> <p>Source: https://www.citizenwatch.com/us/en/technology-smartwatches.html</p>

	<div data-bbox="420 256 1094 380"> <p>Main Processor</p> <ul style="list-style-type: none"> • 12nm Quad-core Arm Cortex A53 up to 2.0 GHz optimized for wearables </div> <div data-bbox="420 396 1094 854"> <p>Co-Processor</p> <ul style="list-style-type: none"> • Designed to support always-on experiences: enhanced ambient mode, sports mode, and traditional watch mode. • Works alone or in conjunction with the main processor • Small footprint: ~21mm² • Cortex M0 processor • Integrates custom designed SRAM, dedicated PMU, a deep learning engine for custom workloads, and range of IOs • Runs highly efficient event-driven RTOS </div> <div data-bbox="420 862 1094 995"> <p>GPU</p> <ul style="list-style-type: none"> • Adreno 504 GPU (up to 320MHz): Open GL ES3.1 optimized power for wearables </div> <div data-bbox="420 1003 1037 1216"> <p>DSP</p> <ul style="list-style-type: none"> • Dual Qualcomm® Hexagon™ QDSP6 v56 • Dedicated MDSP for modem and GPS • Dedicated ADSP for Open Sensor Execution Environment (SEE) and audio </div> <div data-bbox="1373 467 1701 574"> <p>a plurality of processors is arranged on the mobile end unit</p> </div> <div data-bbox="401 1235 1942 1308"> <p>Source: https://www.qualcomm.com/content/dam/qcomm-martech/dm-assets/documents/snapdragon-wear-4100-product-brief_87-pu782-1-c.pdf (annotated)</p> </div> <div data-bbox="401 1344 1942 1414"> <p>Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.</p> </div>
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[12.8] at least one graphics card processor of at least one graphics card supports the calculation of the artificial neural networks,

wherein the at least one graphics card with the at least one graphics card processor is arranged on the mobile end unit or on the central server, and

Company performs and induces others to perform the step wherein at least one graphics card processor of at least one graphics card supports the calculation of the artificial neural networks, wherein the at least one graphics card with the at least one graphics card processor is arranged on the mobile end unit or on the central server.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the Qualcomm Snapdragon Wear 4100+ processor in the watch, comprises the Adreno 504 GPU (“graphics card processor”) that works in parallel with the AI neural network models utilized by the watch to deliver a 24-hour forecast and hourly power score (“calculation of the artificial neural networks”).

Processor

Qualcomm® Snapdragon™ Wear4100+

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Gain deeper insight and develop better habits with the advanced-technological features of the CZ Smart with YouQ — the app that combines AI models built with IBM Watson® Studio and research pioneered by NASA Ames Research Center to deliver a **24-hour forecast** and hourly **Power Score** — a highly personalized indicator of your cognitive and physical energy.

These insights are paired with **Power Fixes** — suggested actions to help you extend peaks and curb drops in alertness and promote the building of better habits, so you can optimize for what’s ahead each day.

Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html>

Main Processor

- 12nm Quad-core Arm Cortex A53 up to 2.0 GHz optimized for wearables

Co-Processor

- Designed to support always-on experiences: enhanced ambient mode, sports mode, and traditional watch mode.
- Works alone or in conjunction with the main processor
- Small footprint: ~21mm²
- Cortex M0 processor
- Integrates custom designed SRAM, dedicated PMU, a deep learning engine for custom workloads, and range of IOs
- Runs highly efficient event-driven RTOS

GPU

- Adreno 504 GPU (up to 320MHz): Open GL ES3.1 optimized power for wearables

Graphics card
processor

DSP

- Dual Qualcomm® Hexagon™ QDSP6 v56
- Dedicated MDSP for modem and GPS
- Dedicated ADSP for Open Sensor Execution Environment (SEE) and audio

Source: https://www.qualcomm.com/content/dam/qcomm-martech/dm-assets/documents/snapdragon-wear-4100-product-brief_87-pu782-1-c.pdf (annotated)

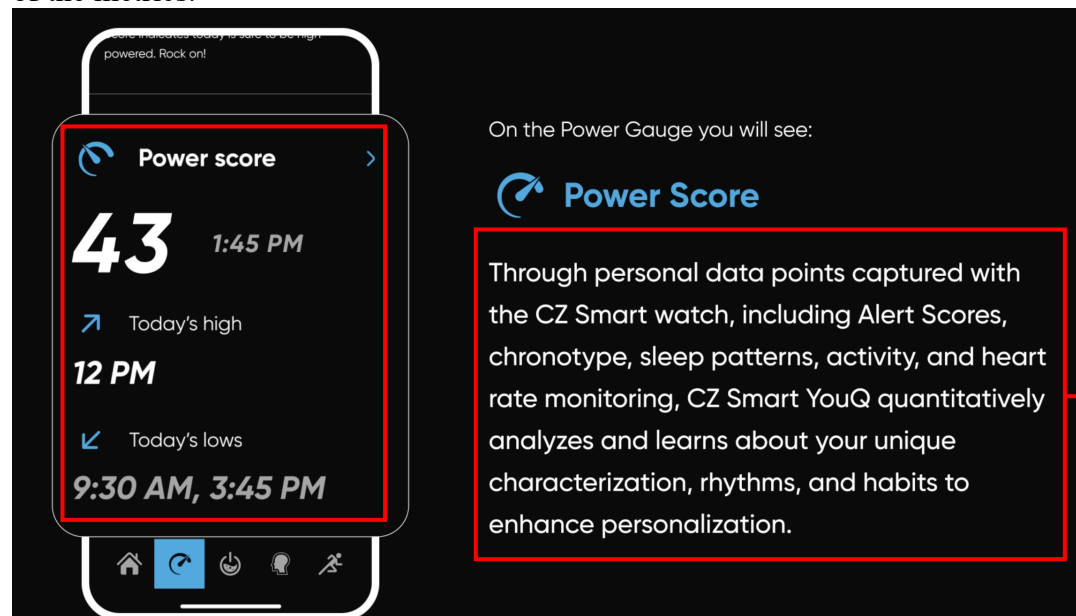
Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

[12.9] wherein the determined current load level of the user is displayed to the user via the mobile end unit in the form of a consolidated load level obtained from a combination of category-specific load levels by forming the arithmetic mean or weighted mean of the category-specific load levels.

Company performs and induces others to perform the step wherein the determined current load level of the user is displayed to the user via the mobile end unit in the form of a consolidated load level obtained from a combination of category-specific load levels by forming the arithmetic mean or weighted mean of the category-specific load levels.

This element is infringed literally, or in the alternative, under the doctrine of equivalents.

For example, the watch calculates and displays (“displayed to the user via the mobile end unit”) the power score of the user (“the determined current load level of the user”) by taking into account the biometric data such as the heart rate variability as well as daily activity, sleep data, heart rate, and blood oxygen saturation (“the category-specific load levels”) throughout the day. Therefore, upon information and belief, the measured power score is a consolidated load level obtained from a combination of multiple health-related metrics by forming the arithmetic mean or weighted mean of the metrics.



combination
of category-
specific load
levels

Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html> (annotated)

The Power Score is a perceptual measure of your Personal Power Level (PPL), which lets you know what your cognitive and physical capacity is at any given moment of the day. You can check your Power Score throughout the day to track your PPL and anticipate when you'll be in peak form or need to take a step back and rest. Your alignment with your body's natural rhythms also impacts your PPL, so it's important to maintain consistent sleep and activity schedules and practice healthy habits. A strong Power Score may not translate to peak performance if you're significantly out of sync with your baseline. So, be sure to wear your CZ Smart watch to bed to capture your sleep data accurately and consistently.

Power Score Ranges

81-100

51-80

0-50

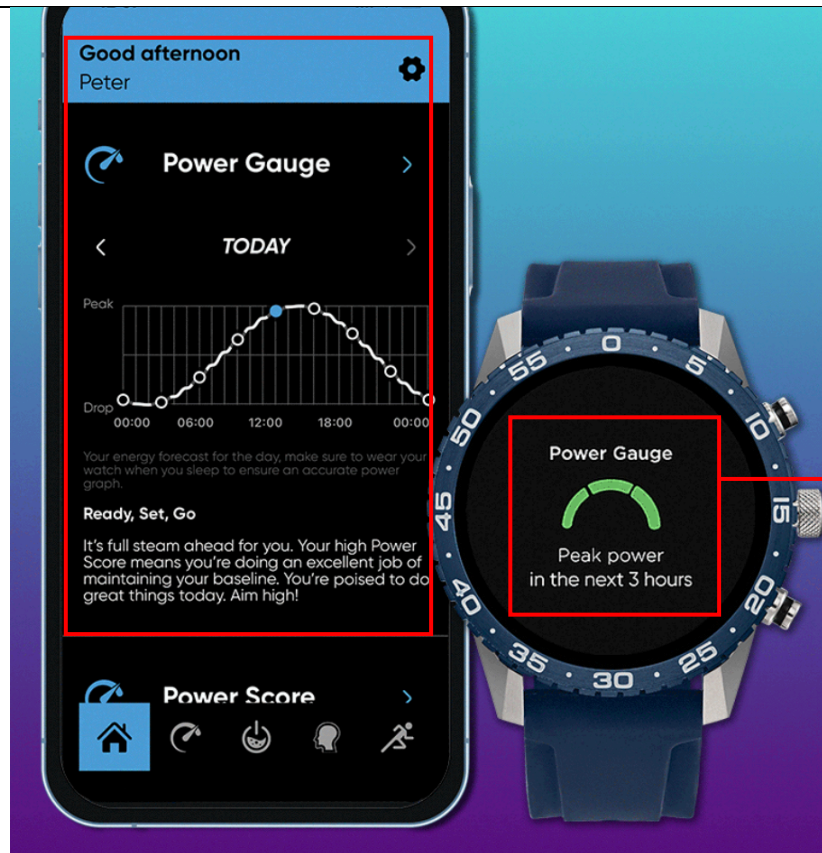
Capacity

High

Good

Low

Source: <https://support.citizenwatch.com/hc/en-us/articles/11457202153623-Making-the-Most-of-the-Power-Gauge>



the determined current load level
of the user is displayed to the
user via the mobile end unit

Source: <https://www.citizenwatch.com/us/en/technology-smartwatches.html> (annotated)

Further, to the extent this element is performed at least in part by Defendant's software source code, Plaintiff shall supplement these contentions pursuant to production of such source code by the Company.

2. List of References

1. <https://www.citizenwatch.com/us/en/technology-smartwatches.html>, last accessed on 04 February, 2025.
2. <https://support.citizenwatch.com/hc/en-us/articles/11457202153623-Making-the-Most-of-the-Power-Gauge>, last accessed on 04 February, 2025
3. https://www.qualcomm.com/content/dam/qcomm-martech/dm-assets/documents/snapdragon-wear-4100-product-brief_87-pu782-1-c.pdf, last accessed on 04 February, 2025.
4. <https://citizenwatch.widen.net/content/hjwdqwk4e/pdf/hjwdqwk4e.pdf?&u=41zuoe>, last accessed on 04 February, 2025.